

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED  
2025 AUG -7 PM 2: 56

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SCOTT TRAUDT, \*  
Plaintiff \*

v. \*

ARI RUBENSTEIN \*  
Defendant \*

GTS SECURITIES LLC \*  
Defendant \*

CHARLES W. SCHWAB AND CO. INC. \*  
SCHWAB HOLDINGS, INC. \*  
Defendant \*

FINANCIAL INDUSTRY \*  
REGULATORY AUTHORITY \*  
Defendant \*

GARY GENSLER \*  
US SECURITIES AND EXCHANGE \*  
COMMISSION \*  
Respondent \*

\*\*\*\*\*

Docket Number: 2:24-cv-00782  
**JURY TRIAL DEMANDED**

2<sup>ND</sup> Amended Complaint

**PLAINTIFF TRAUDT'S MOTION FOR AN EXTENSION OF TIME OF 90 DAYS  
TO FILE A MOTION TO AMEND THE COMPLAINT AGAINST DEFENDANT**

**FINRA**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 7(a)(4)(A) and 7(a)(7) of the United States District Court for the District of Vermont, Plaintiff respectfully moves this Court for an extension of time of ninety (90) days to file a motion to amend the complaint against Defendant Financial Industry Regulatory Authority (FINRA). In support of this motion, Plaintiff submits the following:

**Grounds for Extension**

1. Pending Arbitration with Charles Schwab and Co.: The Court has ordered arbitration to resolve Plaintiff's dispute with Defendant Charles Schwab and Co., and Plaintiff intends to refile for arbitration in September 2025. To proceed in an orderly fashion, Plaintiff must prioritize compliance with the Court's order, which impacts the timing of additional filings against FINRA. (Plaintiff filed for arbitration with the American Arbitration Association in July, 2025, but this was objected to by Schwab under the terms of the arbitration agreement. This has been withdrawn. A FINRA approved arbitration board is being filed for.)
2. Financial and Temporal Burden of FINRA's Arbitration: The arbitration process mandated by Plaintiff's arbitration agreement with Charles Schwab and Co. FINRA imposes a significant financial burden on Plaintiff, requiring filing fees of \$1,475. (**See Appendix A**). Additionally, according to FINRA's website, the arbitration process is expected to take approximately one year to complete. This extended timeline and cost necessitate careful consideration of the timing of further motions in this matter.
3. Judicial Economy and Pending Related Cases: Several federal courts, including the United States District Court for the Northern District of Texas, are currently reviewing challenges to FINRA's constitutionality that are substantially similar to those raised by Plaintiff in this case. Awaiting decisions in these related cases will provide new legal authorities that may guide and strengthen Plaintiff's motion to amend the complaint. Granting an extension promotes judicial economy by avoiding duplicative or premature litigation on issues pending resolution elsewhere.
4. Plaintiff's Ongoing Litigation Commitments: Plaintiff is currently involved in multiple legal proceedings that further constrain his ability to timely file a motion to amend the

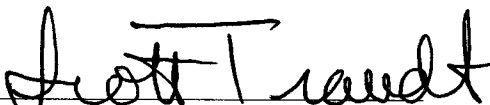
complaint. These include: (a) serving as Plaintiff in *Traudt v. Atkins*, US District Court, District of Vermont, Case No. 2:24-cv-01360-cr; (b) serving as Plaintiff in *Traudt v. Lebanon Police Department et al.*, US District Court, District of New Hampshire, Case No. 23-cv-500-LM-TSM; (c) defending against a Strategic Lawsuit Against Public Participation (SLAPP) filed by a Texas lawyer, Wes Christian, with a history of market manipulation, sanctions, and fraudulent statements to courts and the public, in *Christian v. Traudt*, Cause No. 202508460, 129th Judicial District, Harris County, Texas; and (d) a scheduled hearing on September 4, 2025, in *In Re Meta Materials Inc. Chapter 7 Bankruptcy*, US Bankruptcy Court, District of Nevada, where Plaintiff seeks to disqualify the same attorney, Wes Christian, involved in the Texas defamation suit. Wes Christian serves as a legal advisor to the trustee in the Meta Materials Inc. bankruptcy and has refused to disclose the source of \$11 million in litigation funding, which may materially affect Plaintiff's claims in this matter, as Meta Materials Inc. spun off the MMTLP ticker prior to bankruptcy. These concurrent legal obligations significantly limit Plaintiff's capacity to prepare and file the motion to amend within the current timeframe.

5. Plaintiff's Maritime Service Obligations: Plaintiff, a United States sailor under the Jones Act, is a ward of the admiralty and is entitled to certain protections and deference in legal proceedings. Plaintiff is scheduled to be on sea duty from August 12, 2025, to September 10, 2025, during which time he will have limited access to resources and ability to prepare legal filings. Given this maritime service obligation, Plaintiff respectfully requests the Court's deference in granting a defensible extension to accommodate his duties.

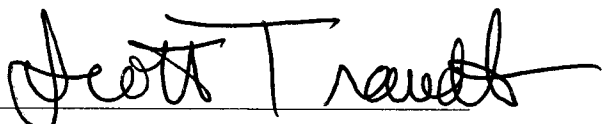
### **Request for Relief**

For the foregoing reasons, Plaintiff respectfully requests that this Court grant a ninety (90) day extension of time to file a motion to amend the complaint against FINRA. This extension will allow Plaintiff to await decisions in related federal cases, manage ongoing litigation commitments, fulfill his maritime service obligations, conserve judicial resources, and ensure that any motion to amend is informed by the most current legal authorities.

Dated: August 7, 2025

  
Scott Traudt, *pro se ipso*  
191 Kibling Hill Road  
Strafford, VT 05072

I hereby certify that a true copy of the foregoing was sent to all named defendants and respondent at the addresses delineated below either by 1<sup>st</sup> Class mail or via email on this 7<sup>th</sup> day of August, 2025.

  
SCOTT TRAUDT

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